REMARKS

Claims 4-6 and 8-12 remain herein. Claims 4-6, 8, 11-12 have been amended, and new claims 13-16 have been added. Applicant's undersigned attorneys appreciate the courtesy of Examiner Lee at the interview conducted at the PTO on June 13, 2006. At that interview, applicant's claims were discussed vis-à-vis the Aoyama and Austin references, as summarized below herein, and the Examiner suggested that applicant seek to use more distinct claim language to distinguish applicant's claimed invention from the prior art, including Roberts U.S. Patent 6,525,274, which was cited by the Examiner during the interview.

All claims, as amended, now recite a supporting structure and "a plate member <u>including</u> a <u>conductor mounting portion of the plate member comprising a substantially longitudinal</u> <u>portion of a conductor path.</u>" This amendment is fully supported in the as-filed patent specification. <u>See e.g.</u>, specification at 8 and 9, and FIGS. 2 and 3. New claims 13-16 are supported by FIGS. 2 and 3.

1. Claims 4-6 and 8-10 were rejected under 35 U.S.C. § 102(b) over Aoyama U.S. Patent 6,222,134.

Aoyama teaches vertically packing and transporting insulators by securing the insulators to a horizontal pallet on one end and by securing the insulators to each other with a tying member on the other end. The Office Action argues that Aoyama's tying member describes the "plate member" recited in applicant's claim 4. However, nowhere does Aoyama disclose that the tying member includes a conductor mounting part defining a substantially longitudinal portion of a conductor path, as recited in claim 4 as amended. This is because the configuration disclosed in Aoyama is intended to provide support only to polymer insulators being shipped, for example, on a horizontal pallet. The configuration of the polymer insulator apparatus claimed in claim 4

of the instant application, in contrast, provides a novel way to multiply the load-bearing strength of polymer insulators in both vertical and horizontal (longitudinal) directions. See specification, page 9; FIG. 3.

Therefore, Aoyama does not disclose all elements of applicant's claims and is not a proper basis for rejection of applicant's claims under § 102. Accordingly, applicant respectfully requests withdrawal of this rejection and allowance of claims 4 and 5. Claim 9 depends from claim 4 and should be allowed for at least the reasons stated above. Claims 6, 8, and 10 depend from claim 5 and should also be allowed for at least the reasons described above.

2. Claims 11 and 12 were rejected under 35 U.S.C. § 103(a) over Aoyama in view of Austin U.S. Patent 1,863,080.

Independent claim 11 as amended recites a polymer insulator apparatus including "plural polymer post insulators, a supporting structure and a plate member <u>including a conductor</u> mounting portion of the plate member comprising a substantially longitudinal portion of a <u>conductor path</u>." This amendment is fully supported in the as-filed patent specification. <u>See e.g.</u>, specification at 8-9; FIGS. 2-3.

As discussed above, Aoyama fails to disclose a plate member including a conductor mounting portion of the plate member comprising a substantially longitudinal portion of a conductor path. Austin, which is cited as prior art for disclosing a steel pole, a wood pole and a steel tower, also does not disclose the recited plate member including a conductor mounting portion of the plate member comprising a substantially longitudinal portion of a conductor path. Thus neither Aoyama nor Austin, either alone or in combination, discloses every element recited in claim 11. Nor is there any disclosure or teaching in either Aoyama or Austin which would have suggested the desirability of combining any portion thereof to render obvious applicant's

U.S. Serial No. 10/719,017

claimed invention. Accordingly, Applicant respectfully requests that this rejection be withdrawn

and that claims 11 and 12 be allowed.

3. During the June 13, 2006 interview at the PTO, Examiner Lee brought to

applicant's undersigned attorneys' attention Roberts U.S. Patent 6,525,274. Roberts is not a

proper basis for rejecting applicant's claimed invention because applicant's claimed invention

includes "a rigidly and unrotatably connected rectangular structure comprising plural polymer

post insulators, a supporting structure and a plate member . . . wherein . . . a second end of each

said polymer post insulator is rigidly and unrotatably connected to said plate member." Roberts,

in contrast, discloses an insulator assembly including switch assemblies that are disengagable

from contacts at the ends of the insulators. See, e.g., FIGS. 2 and 3.

The PTO is hereby authorized to charge or credit any necessary fees to Deposit Account

No. 19-4293. Should the Examiner deem that any further amendments would be desirable in

placing this application in even better condition for issue, he is invited to telephone applicant's

undersigned representative.

Respectfully submitted,

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- 7 -